UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

PLAINTIFFS' MOTION TO SEAL THEIR REPLY MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION FOR RECONSIDERATION OR CLARIFICATION OF THE COURT'S MAY 31, 2023 ORAL RULING ON PLAINTIFFS' MOTION TO LIMIT REDACTIONS Pursuant to the Agreed Confidentiality Order (ECF No. 254) and Local Rule 26.2, Plaintiffs respectfully request that the Court grant this Motion to Seal their Reply Memorandum of Law in Support of their Motion for Reconsideration or Clarification of the Court's May 31, 2023 Oral Ruling on Plaintiffs' Motion to Limit Redactions.

In support of its Motion, Plaintiffs state as follows:

 Plaintiffs' Reply Memorandum discusses and references certain information designated as Confidential and Attorneys' Eyes Only under the terms of the Confidentiality Order entered by this Court.

2. In accordance with Local Rule 26.2(c), Plaintiffs' Reply Memorandum will continue to be provisionally under seal, but an unredacted version will be provided to counsel and the Court.

Additionally, a redacted (public) version will be filed via the ECF system within 14 days.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs' Motion to Seal.

Dated: July 19, 2023

By:/s/Robert D. Gilbert

Robert D. Gilbert Elpidio Villarreal Robert S. Raymar Steven Magnusson

GILBERT LITIGATORS & COUNSELORS, P.C.

11 Broadway, Suite 615 New York, NY 10004 Phone: (646) 448-5269 rgilbert@gilbertlitigators.com pdvillarreal@gilbertlitigators.com Respectfully Submitted,

/s/ Edward J. Normand

Devin "Vel" Freedman Edward J. Normand Peter Bach-y-Rita

FREEDMAN NORMAND FRIEDLAND LLP

99 Park Avenue Suite 1910 New York, NY 10016

Tel: 646-970-7513 vel@fnf.law

tnormand@fnf.law

rraymar@gilbertlitigators.com smagnusson@gilbertlitigators.com

Eric L. Cramer
Ellen Noteware
BERGER MONTAGUE PC

1818 Market Street, Suite 3600 Philadelphia, PA 19103 Tel: 215-875-3000 ecramer@bm.net enoteware@bm.net

Richard Schwartz BERGER MONTAGUE PC 1720 W Division

Chicago, IL 60622 Tel: 773-257-0255 rschwartz@bm.net pbachyrita@fnf.law

/s/ Robert E. Litan
Daniel J. Walker
Robert E. Litan
Hope Brinn
BERGER MONTAGUE PC

2001 Pennsylvania Avenue, NW Suite 300 Washington, DC 20006 Tel: 202-559-9745

dwalker@bm.net rlitan@bm.net hbrinn@bm.net

Counsel for Plaintiffs